

1 J Christopher Jorgensen, Esq.  
 2 Nevada Bar No. 5382  
 3 Chad Olsen, Esq.  
 4 Nevada Bar No. 12060  
**3 LEWIS ROCA ROTHGERBER CHRISTIE LLP**  
 5 3993 Howard Hughes Parkway, Suite 600  
 6 Las Vegas, NV 89169  
 7 Tel: (702) 949-8200  
 8 CJorgensen@lewisroca.com  
 9 COlsen@lewisroca.com

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 11 *Attorneys for Defendant Hyundai Capital America,  
 12 d/b/a Kia Motors Finance, improperly named as Kia America, Inc.*

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**14 UNITED STATES DISTRICT COURT  
 15 DISTRICT OF NEVADA**

16 Borivoj Saric,  
 17 Plaintiff,  
 18 vs.  
 19 Trans Union, LLC; and Hyundai Capital  
 20 America, improperly named as Kia America,  
 21 Inc. dba Kia Motor Finance,  
 22 Defendants.

23 Case No. 2:22-cv-01272-CDS-VCF

24  
**DEFENDANT HYUNDAI CAPITAL  
 25 AMERICA, d/b/a KIA MOTOR  
 26 FINANCE, improperly named as KIA  
 27 AMERICA, INC.'S UNOPPOSED  
 28 MOTION TO EXTEND DEADLINE TO  
 29 RESPOND TO COMPLAINT**

30 **(FIRST REQUEST)**

31 Pursuant to Federal Rule of Civil Procedure 6(b)(1)(A), Defendant Hyundai Capital  
 32 America, d/b/a Kia Motors Finance, improperly named as Kia America, Inc. ("Kia"), through its  
 33 attorneys, respectfully requests that the Court extend the deadline in which Kia has to answer or  
 34 otherwise plead to Plaintiff's Complaint, through and until September 29, 2022. In support of its  
 35 Motion, Kia states as follows:

- 36 1. Plaintiff filed the Complaint initiating this action on August 9, 2022. [ECF No. 1].
- 37 2. Plaintiff served the Summons and Complaint on Kia effective August 11, 2022. This  
 38 established an initial deadline for Kia to respond to the Complaint by September 1, 2022. *Id.*
- 39 3. Kia's deadline to respond to the Complaint has not yet expired.
- 40 4. Kia now respectfully requests that the Court extend Kia's deadline to respond to the  
 41 Complaint, through and including September 29, 2022.
- 42 5. Counsel for Kia discussed the requested extension with counsel for plaintiff Michael  
 43 Kind, who does not oppose the requested extension.

6. Kia desires additional time to respond to the Complaint in order to investigate the allegations and determine whether early resolution is possible.

7. This is Kia's first request for an extension; this request is brought in good faith and not made to unnecessarily delay discovery or the proceedings in this matter.

8. No party will be prejudiced by the requested extension nor, respectfully, will the extension unduly burden the Court.

9. Granting the requested extension is in the interest of justice and is otherwise right and proper.

**WHEREFORE** Defendant Hyundai Capital America, d/b/a Kia Motors Finance, improperly named as Kia America, Inc. respectfully requests that the Court grant its Unopposed Motion for Extension of Time to Respond to Complaint, extending its deadline to answer or otherwise plead to Plaintiff's Complaint by and through September 29, 2022, and award such other relief the Court deems just and proper.

DATED this 1st day of September, 2022.

# LEWIS ROCA ROTHGERBER CHRISTIE LLP

/s/ J Christopher Jorgensen  
J Christopher Jorgensen, Esq., (SBN 5382)  
Chad Olsen, Esq. (SBN 12060)  
3993 Howard Hughes Parkway, Suite 600  
Las Vegas, NV 89169  
Tel: (702) 949-8200  
CJorgensen@lewisroca.com  
COlsen@lewisroca.com

*Attorneys for Defendant Hyundai Capital America,  
d/b/a Kia Motors Finance, improperly named as Kia  
America, Inc.*

## ORDER

## IT IS SO ORDERED.

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UNITED STATES MAGISTRATE JUDGE

DATED: 9-19-2022

**CERTIFICATE OF SERVICE**

I hereby certify that, on September 1, 2022, a true and exact copy of the foregoing has been served upon all parties via CM/ECF.

/s/ Rebecca J. Contla  
An employee of Lewis Roca  
Rothgerber Christie LLP

3993 Howard Hughes Parkway, Suite 600  
Las Vegas, NV 89169

**LEWIS ROCA**